

C.A., K.P., R.K., and T.H.v. Extended Stay America

Page 1

1 IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN  
2 DISTRICT OF GEORGIA

3 ATLANTA DIVISION

4 C.A., K.P., R.K., AND T.H., )

)

5 Plaintiffs, )

) CIVIL ACTION NO.

6 vs. )

) 1:21-cv-00957-SDG

)

7 EXTENDED STAY AMERICA, INC.; )

ESA MANAGEMENT, LLC; and HVM, )

8 L.L.C., )

)

9 Defendants. )

)

10 VIDEOTAPED VIDEO TELE-CONFERENCE DEPOSITION OF

11 C.A.

12 November 10, 2022

13 10:25 a.m.

14 Bondurant, Mixson &amp; Elmore, LLP

15 3200 One Atlantic Center

16 1201 West Peachtree Street

17 Atlanta, Georgia

18 Robin K. Ferrill, CCR-B-1936, RPR

## APPEARANCES OF COUNSEL

On behalf of the Plaintiffs

TIANA S. MYKKELTVEDT, Esquire

MICHAEL R. BAUMRIND, Esquire

BETH RICHARDSON, Paralegal (Via Zoom)

BONDURANT, MIXSON & ELMORE, LLP

1201 West Peachtree Street NW

Suite 3900

Atlanta, Georgia 30309

On behalf of the Defendants

PATRICK B. MOORE, Esquire

SARAH J. UNATIN, Esquire

Weinberg, Wheeler, Hudgins, Gunn & Dial, LLC

3344 Peachtree Road NE

Suite 2400

Atlanta, Georgia 30326

404.876.2700

pmoore@wwhgd.com

sunatin@wwhgd.com

ALSO PRESENT:

David Ramirez, Videographer

1 mom had evicted me and Lenny, Lenora, and took [REDACTED]  
2 in May.

3 So then I got custody of [REDACTED] every  
4 weekend June, July, and here we are in August, and he  
5 gets arrested. And when I knew he wasn't going to  
6 get out soon and I knew that my child had been taken  
7 from me and I knew that I had my mom right here and  
8 my child right here and that was my freeing moment  
9 because I knew he wasn't going to get out soon. So  
10 there was no way he could get -- it was just that  
11 moment of my -- like I'm out. My life is changed.  
12 My life is different.

13 I think that when you see these messages  
14 and everything, I understand it's all -- of course, I  
15 wanted -- I wanted it to be what it was. I wanted  
16 it -- I wanted to be the bottom bitch. I wanted the  
17 validation. I wanted the -- you know. And it wasn't  
18 that. I was in a very frickin' dark place, and I  
19 almost died because he almost killed me because I was  
20 paying him with his own money.

21 I mean, my broken nose from Fresh. Fresh  
22 threw me in the wall when I was pregnant, into the  
23 wall and I'm nine months pregnant.

24 I mean, I just felt very stuck. So anyway,  
25 my point is when Bagz got arrested and my child was

1 Bagz didn't do anything to you, did he?

2 A. When I went and did what?

3 Q. When you quit Bagz and went to work with  
4 somebody else, Bagz didn't come after you?

5 A. That's why I usually quit, though, is  
6 because he did something to me.

7 Q. But when you quit, he didn't do anything to  
8 you, correct?

9 A. That's not true.

10 Q. What did he do when you quit the first  
11 time?

12 A. The first time? I mean, we are going  
13 back -- I can't answer that. You are going to have  
14 to give me -- let me go back to 2009 because I ran  
15 from him the first time in 2009 and left all my  
16 stuff. I mean, I had to hide from his girl that was  
17 trying to come pick me up at the college. I was -- I  
18 had to like hide in the bushes to get away from them.  
19 That was the first time. I mean, he's always been  
20 abusive. He made Becca frickin' wipe shit off from  
21 his ass in front of all of us. I have had a broken  
22 nose. I've had a broken eardrum. I have scars right  
23 here that you can see.

24 Q. I thought the nose was from Fresh?

25 A. It was. But I'm saying it was constantly

1 being beat up. And I especially got the worst end of  
2 it because for some reason, I wasn't the favored one,  
3 or whatever the fuck, ever, you know.

4 Q. You were constantly getting beat up, is  
5 that what you said?

6 A. I got beat up a lot, yes.

7 Q. And all the pictures and posts on social  
8 media, you never once posted anything about how this  
9 life I'm living is also hard and it's dangerous and  
10 all that?

11 A. No, that wasn't trending yet to show the  
12 real side of life.

13 Q. The only thing you ever posted was stacks  
14 of money and pictures of you out at restaurants and  
15 on rooftop pools; correct?

16 A. Staged pictures.

17 Q. Right?

18 A. Yes, staged pictures that he told me to  
19 post with wads of money that he gave me, yes.

20 Q. And pictures of you out at hotels and  
21 restaurants, nightclubs?

22 A. Anything to make it look good, absolutely.

23 Q. Well, you went to those places?

24 A. Of course, I did, in those short dresses  
25 and the high heels, and I stayed in that outfit for

C.A., K.P., R.K., and T.H.v. Extended Stay America

Page 311

## C E R T I F I C A T E

STATE OF GEORGIA )

) ss.:


FULTON COUNTY )

I, Robin Ferrill, Certified Court Reporter  
within the State of Georgia, do hereby certify:

That C.A.the witness whose deposition is  
hereinbefore set forth, was duly sworn by me and that  
such deposition is a true record of the testimony  
given by such witness.

I further certify that I am not related to  
any of the parties to this action by blood or  
marriage; and that I am in no way interested in the  
outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set  
my hand this 2nd day of December, 2021.



ROBIN K. FERRILL, RPR